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IN THE UNITED STATES DISTRICT COURT
FOR NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

P & K PROPERTY, LLC

Plaintiff,

vs.

HARTFORD CASUALTY INSURANCE
COMPANY, and Does 1 through 10,
inclusive,

Defendants.

Case No. C 11 06606 SI

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISCOVERY
CUTOFF FOR 30 DAYS AND TO
CONTINUE CASE MANAGEMENT
CONFERENCE**

Pursuant to Northern District Local Rule 6-1 and 6-2, and at plaintiff's request, plaintiff and defendant hereby stipulate to extend the time to conduct discovery and designate experts for a period of 30 days from the time originally ordered by the Court. Plaintiff and defendant further stipulate to continue the Case Management Conference currently set for July 13, 2012, to August 2, 2012.

The parties are currently conducting discovery, which due to scheduling conflicts of the plaintiff and its counsel, may extend past the August 31, 2012 discovery cutoff. Specifically, counsel for plaintiff is scheduled for a preplanned family vacation from July 6, 2012 to July 25, 2012, and will be unavailable to participate in depositions contemplated by the parties. Counsel for plaintiff and defendant have met and conferred regarding deposition schedules and agree that extending the non expert and expert discovery cutoff, and expert designation, for a period of 30

1 days is warranted to allow discovery to be completed and the parties time to prepare their claims
2 and defenses prior to trial.

3 There have been no prior modifications, whether by stipulation or Court order, to the
4 deadlines and Case Management Conference hearing, set forth in this stipulation.

5 Therefore, the parties stipulate to the modified dates as set forth below:

- 6 1) 10/1/12: NON EXPERT DISCOVERY CUTOFF (Originally set for
7 8/31/12);
- 8 2) 10/29/12: DESIGNATION OF EXPERTS (Originally set for 9/28/12);
- 9 3) 11/19/12: REBUTTAL TO EXPERT DESIGNATION (Originally set for
10 10/19/12);
- 11 4) 1/2/13: EXPERT DISCOVERY CUTOFF (Originally set for 11/31/12);
- 12 5) 8/2/12: Case Management Conference (Originally set for 7/13/12).

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14 Respectfully submitted,

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16 DATED: June 28, 2012

McINERNEY & DILLON, P.C.

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18 /S/

19 By: Neil H. Bui
20 Neil H. Bui
Attorney for Plaintiff P&K Property, LLC

21 DATED: June 28, 2012

22 BERGER KAHN
A Law Corporation

23
24 /S/

25 By: Ted A. Smith
26 Ted A. Smith
Attorneys for Defendant
Hartford Casualty Insurance Company

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ORDER

PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED.

DATED: 7/5, 2012.



SUSAN ILLSTON
U.S. DISTRICT COURT JUDGE